

REMARKS/ARGUMENTS

Claims 1, 3, and 6-7 are rejected under 35 U.S.C. 102(b) as being anticipated by Fujimoto (US 6,377,500).

5 Response:

The applicant would like to point out how claim 1 is patentably distinguished from Fujimoto. Claim 1 contains the limitations of “determining if a look up table is stored in each zone of the nonvolatile memory, and if the zones of the nonvolatile memory do not contain a corresponding look up table, storing a look up table of each zone in at least a spare block of the zone.”

The claimed invention utilizes each zone of a nonvolatile memory for storing look up tables. This spreads the look up tables into different zones instead of storing the look up tables in one physical location in memory. In addition, the physical locations of the backup blocks used to store the look up tables can be changed when the host updates the look up tables. Therefore, the blocks used to store the look up tables do not have fixed physical locations.

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On the other hand, Fujimoto teaches in Figure 1 and in column 8, lines 11-14; column 9, lines 11-14; and column 12, lines 42-44 of the specification that the look up tables are all stored in the starting physical location of the flash memory. Therefore, Fujimoto fails to teach that the look up tables are distributed among each of the zones of the flash memory, as is claimed in claim 1, and instead teaches using a fixed location for storing all of the look up tables. Since Fujimoto does not

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teach all of the limitations of claim 1, claim 1 is patentable over the cited prior art.

Furthermore, claims 3, 6, and 7 are dependent on claim 1, and should be
5 allowed if claim 1 is allowed. Reconsideration of claims 1, 3, 6, and 7 is therefore respectfully requested.

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

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Sincerely yours,

Winston Hsu

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